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10 Attorneys for WAYMO LLC

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 vs.

16 UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

18 CASE NO. 3:17-cv-00939-WHA

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**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC. AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF THEIR  
MOTION FOR SUMMARY JUDGMENT,  
MOTION TO STRIKE TS 96, AND  
DAUBERT MOTION**

1 I, Felipe Corredor, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Defendants Uber Technologies, Inc. and  
 7 Ottomotto, LLC’s Administrative Motion to File Under Portions of Their Motion for Summary  
 8 Judgment, Motion to Strike TS 96, and *Daubert* Motion (the “Administrative Motion”). The  
 9 Administrative Motion seeks an order sealing highlighted portions of Uber’s Motion for Summary  
 10 Judgment, Motion to Strike TS 96, and *Daubert* Motion (“Uber’s Motion”) and Exhibit 2 to the  
 11 Declaration of Esther Chang, as well as the entirety of Exhibit 1 thereto.

12       3. The portions of Uber’s Motion marked in red boxes, the entirety of Exhibit 1, and the  
 13 green highlighted portions of Exhibit 2, contain or refer to trade secret information, which Waymo  
 14 seeks to seal.

15       4. Uber’s Motion (portions marked in red boxes in version filed herewith), Exhibit 1  
 16 (entire document) and Exhibit 2 (green highlighted portions) contain, reference, and/or describe  
 17 Waymo’s asserted trade secrets or information that, from context, tends to disclose Waymo’s asserted  
 18 secrets. The information Waymo seeks to seal includes the confidential design and functionality of  
 19 Waymo’s proprietary autonomous vehicle system, including its LiDAR designs, which Waymo  
 20 maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-  
 21 47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-31). The public disclosure of  
 22 this information would give Waymo’s competitors access to descriptions of the functionality or  
 23 features of Waymo’s autonomous vehicle system. If such information were made public, I understand  
 24 that Waymo’s competitive standing would be significantly harmed.

25       5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Motion and  
 26 Exhibits 1 and 2 that merit sealing.

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1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on September 15, 2017.

4 By /s/ Felipe Corredor  
5 Felipe Corredor  
6 Attorneys for WAYMO LLC

7  
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
10 document has been obtained from Felipe Corredor.

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12 By: /s/ Charles K. Verhoeven  
13 Charles K. Verhoeven  
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